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February 9, 2021

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Krishanthi, et al. v. Rajaratnam, et al.*
Civil Action No. 09-05395 (BRM)(JAD)

Dear Judge Dickson:

As Your Honor is aware, this Firm, along with Perry Guha, LLP, represents Defendants Raj Rajaratnam and the Estate of Jesuthasan M. Rajaratnam ("Defendants") in the above-captioned matter. In response to Your Honor's Order at ECF No. 445, Defendants respectfully submit the enclosed proposed order, which includes deadlines for all remaining Phase I discovery issues, as a more comprehensive alternative to Plaintiffs' submission of yesterday, ECF No. 449. Alternatively, given the parties' conflicting proposed schedules, we would welcome an instruction from the Court that directs the parties to further meet and confer regarding a joint schedule to narrow the scope of disagreement.

Thank you for Your Honor's careful attention to this matter, and please do not hesitate to contact me if the Court has any questions or concerns.

Respectfully submitted,

s/Thomas R. Valen
Thomas R. Valen

cc: All Counsel of Record (via ECF)